

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISIONMary T. Thomas, *et al.*,

Plaintiffs,

v.

Marci Andino, *et al.*,

Defendants.

No.: 3:20-cv-01552-JMC

**Election Defendants’
Motion for Leave to File Excess
Pages in Reply in Support of
Motion for Summary Judgment**

Pursuant to Local Civil Rules 7.04, 7.05(B), and 7.06, Defendants Marci Andino, John Wells, JoAnne Day, Clifford J. Edler, Linda McCall, and Scott Moseley (“Election Defendants”) move for leave to file excess pages in reply in support of their motion for summary judgment (ECF No. 108).

The Election Defendants’ summary judgment brief did not seek leave for additional pages for their summary judgment memorandum, using only the thirty-five pages allowed by the Local Civil Rules. The Plaintiffs recently sought (ECF No. 120) and obtained (ECF No. 121) additional pages to respond to that motion, and they filed a fifty-page brief and over 400 pages of exhibits (ECF No. 125). The Election Defendants respectfully request that the Court grant them five additional pages for their reply brief, thereby extending the page limit from fifteen to twenty pages. These additional pages are warranted here given the public importance of the issues in this case and the need to respond sufficiently to the arguments the Plaintiffs made.

The Election Defendants have conferred with counsel for the other parties in this case, who have consented to this request for additional pages.

Respectfully Submitted,

s/ Wm. Grayson Lambert

M. Elizabeth Crum
Fed. ID No. 372
Wm. Grayson Lambert
Fed. ID No. 11761
Jane W. Trinkley
Fed. ID No. 4143
BURR & FORMAN LLP
Post Office Box 11390
Columbia, SC 29211
(803) 799-9800

Robert Bolchoz
ROBERT BOLCHOZ LLC
P.O. Box 6989
Columbia, SC 29260
(803) 790-7474

Karl Smith Bowers, Jr.
BOWERS LAW OFFICE
P.O. Box 50549
Columbia, SC 29250
(803) 753-1099

Harrison D. Brant
STATE ELECTION COMMISSION
1122 Lady Street, Suite 500
Columbia, SC 29201
(803) 734-9063

Counsel for Election Defendants

August 20, 2020